UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, et al.,

Debtors. 1

PROMESA Title III

No. 17 BK 3283-LTS

(Jointly Administered)

MOTION TO INFORM AMERINATIONAL COMMUNITY SERVICES, LLC'S APPEARANCE AT THE AUGUST 4-5, 2021 OMNIBUS HEARING

COMES NOW AmeriNational Community Services, LLC (hereafter "<u>AmeriNat</u>") as servicer for the GDB Debt Recovery Authority (the "<u>DRA</u>") authorized to pursue and enforce the DRA's rights and remedies in any legal proceeding, including the DRA's participation as a creditor in the instant Title III case, by and through the undersigned legal counsel, and respectfully submits this motion in compliance with the Court's *Order Regarding Procedures for August 4-5, 2021 Omnibus Hearing* (Dkt. No. 17522) (the "Scheduling Order"):

1. Attorney Arturo J. García-Solá of McConnell Valdés, LLC will appear on behalf of AmeriNat at the August 4-5, 2021 Omnibus Hearing (the "Omnibus Hearing"), which will be conducted telephonically via CourtSolutions.

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Building Authority ("PBA") (Bankruptcy Case No. 19 BK 5523-LTS(Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

- 2. Mr. García-Solá may present oral argument related to the following pleadings:
 - a. The DRA Parties' Motion and Memorandum of Law in Support of Their Motion for Relief From the Automatic Stay, or in the Alternative, Ordering Payment of Adequate Protection (Case No. 17-03567, Dkt. No. 591);
 - b. The DRA Parties' Amended Motion and Memorandum of Law in Support of Their Request for Adequate Protection or Relief from the Automatic Stay (Case No. 17-03567, Dkt. No. 998);
 - c. The Government Parties' Objection to the DRA Parties' Standing to Seek Relief from the Automatic Stay or in the Alternative, Ordering Payment of Adequate Protection (Case No. 17-03567, Dkt. No. 1009);
 - d. Joinder of Official Committee of Unsecured Creditors in Support of Government Parties' Objection to DRA Parties' Standing to Seek Relief from Automatic Stay or in Alternative, Ordering Payment of Adequate Protection (Case No. 17-03567, Dkt. No. 1010);
 - e. The DRA Parties' Response to the Government Parties Objection to the DRA Parties' Standing to Seek Relief from the Automatic Stay or in the Alternative, Ordering Payment of Adequate Protection (Case No. 17-03567, Dkt. No. 1021);
 - f. The Government Parties' Reply Solely Regarding the DRA Parties' Standing to Seek Relief From the Automatic Stay or in the Alternative, Ordering Payment of Adequate Protection (Case No. 17-03567, Dkt. No. 1046); and
 - g. Any other responses or motions related to the foregoing.
- 3. AmeriNat reserves the right to be heard and present oral argument on any matter identified in the agenda to be filed by the Oversight Board in connection with the Omnibus Hearing, or to address any statement or issue that may be raised by any party at the Omnibus Hearing related to the Title III cases or adversary proceedings which may affect the interests of the DRA. AmeriNat also reserves the right to amend this motion as needed.

WHEREFORE, AmeriNat respectfully requests the Court to take note of the foregoing and deem it in compliance with the Scheduling Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 29th day of July, 2021.

CERTIFICATE OF SERVICE: In accordance with Fed. R. Bankr. P. 9014(b), Fed. R. Bankr. P. 7004(b), and the Court's *Fifteenth Amended Notice, Case Management and Administrative Procedures Order* (Dkt. No. 17127-1) (the "CMP Order"), we hereby certify that

a true and exact copy of the foregoing was sent by electronic mail upon all the parties listed in the Master Service List and by U.S. mail upon all the Standard Parties listed in the CMP Order.

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